FILED IN MY OFFICE DISTRICT COURT CLERK 9/14/2015 11:52:46 AM STEPHEN T. PACHECO Maureen Naranjo

STATE OF NEW MEXICO COUNTY OF SANTA FE FIRST JUDICIAL DISTRICT COURT

Cause No. D-101-CV-2015-00063

EVAN, ROCHFORD, as Personal Representative Of the Wrongful Death Estate of JAMES ROCHFORD, deceased,

Plaintiff,

VS.

THE CITY OF SANTA FE, SANTA FE POLICE DEPARTMENT and OFFICER SUZANNE BRUNK

Defendants.

DEFENDANTS' EXPERT WITNESS LIST

COME NOW, Defendants, the City of Santa Fe, Santa Fe Police Department, Officer Suzanne Brunk, by and through their attorneys of record, Brennan & Sullivan, P.A., and pursuant to the Court's Scheduling Order entered April 24, 2015 presents the following expert witness list:

Gary Michael Vilke, M.D.
 Department of Emergency Medicine
 UCSD Medical Center
 200 W. Arbor Drive
 San Diego, CA 92103-8673
 Phone (619) 543-6210

Dr. Vilke is expected to testify as to the cause of James Rochford's death. The basis of his opinions will be review of documents identified through discovery in this case, which at this time include Plaintiff's medical records, the autopsy report, and police reports.



2. Possible police procedures expert.

Plaintiff has an unopposed motion to amend his complaint to add civil rights violations. If plaintiff should amend his complaint, Defendants foresee the need to name an as yet unidentified, police procedures expert.

Respectfully submitted,

BRENNAN & SULLIVAN, P.A.

By: /s/Sabrina Rodriguez Salvato
Sabrina Rodriguez Salvato
James P. Sullivan
128 East DeVargas
Santa Fe, New Mexico 87501
(505) 995-8514
Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of September, 2015, I filed and served the foregoing electronically through the First Judicial District Court's File and Serve system. In addition, I provided a current CV for Dr. Vilke via email to the following:

David Elias Idinopulos, Esq.
Michael C. Ross, Esq.
Elias Law, P.C.
111 Isleta Boulevard, SW, Suite A
Albuquerque, NM 87105
david@abogadoelias.com
Attorneys for Plaintiff

By: /s/ Sabrina R. Salvato
Sabrina Rodriguez Salvato